

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR
WIRE FRAUD**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
WALLACE A. BOURGEOIS	*	VIOLATION: 18 U.S.C. §1343
	*	*
	*	*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross ("Red Cross") established assistance centers throughout the region in the late summer and early fall of 2005.

2. At these assistance centers, people affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also asked if they had previously received financial assistance from the Red Cross and were required to attest and sign a statement that certified that the applicant had not received any other financial assistance from the Red Cross from any other assistance center.

3. Once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued "Discover" card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued Client Assistance Card ("CAC card"), which the Red Cross purchased from national banks and which operated in a manner consistent with debit/credit/ATM cards, issued on-site; (4) A personal check authorized by the Red Cross and mailed through the United States Postal Service to an address provided by the applicant.

4. The Red Cross purchased thousands of CAC cards to assist the victims of Hurricane Katrina and Rita. A CAC card is a type of prepaid card that clients can use at nearly any retail location that accepts MasterCard. The authorization and tracking of purchases and withdrawals for the CAC card transactions were handled by a third-party vendor with servers located in Sunrise, Florida.

5. The defendant, **WALLACE A. BOURGEOIS**, presented himself to Red Cross assistance centers on six (6) occasions between on or about September 12, 2005 and on or about October 3, 2005. On at least three occasions, he applied for financial assistance and indicated that he had not received any other financial assistance from the Red Cross. As a result of his actions on these six

applications, **WALLACE A. BOURGEOIS**, received direct financial assistance from the Red Cross in one of the four manners described above, totaling \$9,090, of which \$7,525 was fraudulently obtained.

B. THE SCHEME TO DEFRAUD:

Beginning on or about September 12, 2005 and continuing through on or about October 3, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **WALLACE A. BOURGEOIS**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Red Cross, by means of false representations, pretenses, and promises.

C. THE USE OF THE WIRE:

On or about September 22, 2005, in the Eastern District of Louisiana, the defendant, **WALLACE A. BOURGEOIS**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, **WALLACE A. BOURGEOIS**, used a Red Cross-issued CAC card numbered XXXX XXXX XXXX 1817 to obtain property, goods, services, and money in the Eastern District of Louisiana, specifically at a Chase ATM machine in LaPlace, Louisiana which caused a signal, sign, writing, and sound to be transmitted to a data center outside the state of Louisiana, allowing the defendant, **WALLACE A. BOURGEOIS**, to receive the property,

goods, services, and money by the use of the falsely and fraudulently obtained CAC card issued to the defendant, **WALLACE A. BOURGEOIS** on or about September 21, 2005; all in violation of Title 18, United States Code, Section 1343.

JIM LETTEN
UNITED STATES ATTORNEY
Louisiana Bar Roll No. 8517

JAN MASELLI MANN
First Assistant United States Attorney
Louisiana Bar Roll No. 9020

SHARAN E. LIEBERMAN
Assistant United States Attorney

New Orleans, Louisiana
July 7, 2009

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